

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: Janice C. Robinson, Debtor

**Case No. 22-10414-SDM
CHAPTER 13**

APPLICATION TO BE EMPLOYED AS SPECIAL COUNSEL NUNC PRO TUNC

COMES NOW, Morgan & Morgan (“Applicant”), by and through undersigned counsel, and pursuant to 11 U.S.C. §327(e) and F.R.B.P. 2014(a), files this Application to be Employed Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

1. That Morgan & Morgan represent that in the administration of the above referenced Debtors’ estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtor’s personal injury claim.
2. That the Applicant desires to be employed to render services in connection with the claim as Special Counsel for the Debtor.
3. That it would be in the best interests of the estate that said firm be employed.
4. An attorney for Morgan & Morgan has attached his affidavit hereto, stating that the firm is a disinterested party to Debtor’s estate. See Exhibit “A”.
5. That in consideration of said representation, Morgan & Morgan will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.
6. The bankruptcy case was filed subsequent to the employment of Morgan & Morgan. The attorney makes every effort when interviewing potential clients to determine their bankruptcy status, including but not limited to a PACER search for same.
7. The debtor signed an employment contract with the attorney on December 30, 2021, and the attorney herein has already performed work in connection with that contract, and would therefore seek to have his employment approved as of the date of the employment contract. Furthermore, no creditor has been or will be, upon information and belief, prejudiced by the nunc pro tunc approval of the employment, as same is being undertaken for the benefit of the bankrupt estate.
8. Upon information and belief, the approval of this application for employment would not be prejudicial to any creditor or party-in-interest, as same is for the purpose of assisting the debtor in liquidating an asset of the bankrupt estate. Furthermore, the attorney shall file all required applications for approval of the settlement and approval of any associated fees and expenses as required by the Court, giving all creditors and parties-in-interest timely notice and opportunity to respond to said applications prior to any distributions being made.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Morgan and Morgan as Special Counsel for the Debtor under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

Morgan & Morgan, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above Motion to was forwarded on August 10, 2023, to the Debtor's attorney, case trustee and U.S. Trustee as indicated in the "21 day notice" that accompanies this Application.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.